

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

JEFF MOORE, ELIZABETH BROOKE MOORE,
and VIDAL TORRES on behalf of themselves and all
others similarly situated,

Plaintiffs,

V.

YELLOW CORPORATION, et al.,

Defendants.

WILLIAM G. COUGHLIN, et al.,

Plaintiffs,

V.

YELLOW CORPORATION, et al.

Defendants.

**NOTICE OF AGENDA FOR HEARING SCHEDULED ON JANUARY 30, 2025 AT
10:00 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE CRAIG T.
GOLDBLATT AT THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET,
3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801**

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures <https://www.deb.uscourts.gov/judge-craig-t-goldblatt> and the Court's website <https://www.deb.uscourts.gov/ecourt-appearances> for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

RESOLVED MATTERS:

1. Motion of the International Brotherhood of Teamsters and Teamsters National Freight Negotiating Committee for Entry of an Order Authorizing Teamsters to File Under Seal and Redact Exhibits to Declaration of Emma Woods in Support of the Teamsters' Motion Pursuant to Bankruptcy Rule 3018(a) for Temporary Allowance of Claims for Voting Purposes with Respect to Debtors' Plan of Liquidation [Filed: 1/8/25] ([Docket No. 5354](#))

Response Deadline: January 23, 2025, at 4:00 p.m. (ET).

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. Certification of No Objection [Filed: 1/24/25] ([Docket No. 5528](#))
- B. [Signed] Order [Filed: 1/27/25] ([Docket No. 5549](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

2. Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Omnibus Brief in Support of Their Combined Motions in Limine and to Deem Undisputed Facts in the Summary Judgment Opinion as Established Pursuant to Rule 56(g) [Filed: 1/9/25] ([Docket No. 5367](#)) [Adv. Pro. 23-50457, [Docket No. 191](#)] [Adv. Pro. 23-50761, [Docket No. 151](#)]

Response Deadline: January 23, 2025, at 4:00 p.m. (ET).

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Omnibus Brief in Support of Their Combined Motions in Limine and to Deem Undisputed

Facts in the Summary Judgment Opinion as Established Pursuant to Rule 56(g) [Filed: 1/27/25] ([Docket No. 5539](#)) [Adv. Pro. 23-50457, [Docket No. 223](#)] [Adv. Pro. 23-50761, [Docket No. 178](#)]

- B. [Signed] Order Authorizing Debtors to File Under Seal Certain Portions of Debtors' Omnibus Brief in Support of Their Combined Motions in Limine and to Deem Undisputed Facts in the Summary Judgment Opinion as Established Pursuant to Rule 56(g) [Filed: 1/27/25] ([Docket No. 5550](#)) [Adv. Pro. 23-50457, [Docket No. 226](#)] [Adv. Pro. 23-50761, [Docket No. 180](#)]

Status: The Court has entered an order on this matter. No hearing is necessary.

3. Motion of the International Brotherhood of Teamsters, Teamsters National Freight Industry Negotiating Committee, and International Association of Machinists and Aerospace Workers for Entry of an Order Authorizing Unions to File Under Seal and Redact Unions' Opposition to the Debtors' Motions in Limine [Filed: 1/16/25] ([Docket No. 5429](#))

Response Deadline: January 23, 2025, at 4:00 p.m. (ET).

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. Certification of No Objection [Filed: 1/24/25] ([Docket No. 5527](#))
- B. [Signed] Order [Filed: 1/27/25] ([Docket No. 5547](#))

Status: The Court has entered an order on this matter. No hearing is necessary.

4. Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of (I) Debtors' Omnibus Opposition to Unions and Moore Plaintiffs' Motions in Limine; (II) Debtors' Omnibus Opposition to Unions' Motion in Limine #3; and (III) Debtors' Trial Brief [Filed: 1/16/25] ([Docket No. 5445](#)) [Adv. Pro. 23-50457, [Docket No. 213](#)] [Adv. Pro. 23-50761, [Docket No. 168](#)]

Response Deadline: January 23, 2025, at 4:00 p.m. (ET).

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. [Proposed] Order Authorizing Debtors to File Under Seal Certain Portions of (I) Debtors' Omnibus Opposition to Unions and Moore Plaintiffs' Motions in Limine; (II) Debtors' Omnibus Opposition to Unions' Motion in Limine #3; and (III) Debtors' Trial Brief [Filed: 1/16/25] ([Docket No. 5445, Exhibit A](#)) [Adv. Pro. 23-50457, [Docket No. 213, Exhibit A](#)] [Adv. Pro. 23-50761, [Docket No. 168 Exhibit A](#)]
- B. Certification of No Objection Regarding Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of (I) Debtors' Omnibus Opposition to Unions and Moore Plaintiffs' Motions in Limine; (II) Debtors' Omnibus Opposition to Unions' Motion in Limine #3; and (III) Debtors' Trial Brief [Filed: 1/27/25] ([Docket No. 5540](#)) [Adv. Pro. 23-50457, [Docket No. 224](#)] [Adv. Pro. 23-50761, [Docket No. 179](#)]
- C. [Signed] Order Authorizing Debtors to File Under Seal Certain Portions of (I) Debtors' Omnibus Opposition to Unions and Moore Plaintiffs' Motions in Limine; (II) Debtors' Omnibus Opposition to Unions' Motion in Limine #3; and (III) Debtors' Trial Brief [Filed: 1/27/25] ([Docket No. 5551](#)) [Adv. Pro. 23-50457, [Docket No. 226](#)] [Adv. Pro. 23-50761, [Docket No. 181](#)]

Status: The Court has entered an order on this matter. No hearing is necessary.

ADJOURNED MATTERS:

- 5. Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 11/21/24] ([Docket No. 5018](#))

Response Deadline: December 5, 2024, at 4:00 p.m. (ET) (*extended for the Committee to January 20, 2025*).

Reply Deadline: January 15, 2025, at 4:00 p.m. (ET)

Replies Received:

- A. Debtors' Reply in Support of Its Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code [Filed: 1/15/25] ([Docket No. 5412](#))

Responses Received:

- A. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee's Response to Debtors' Twenty-Second Omnibus (Substantive) Objection to Proofs of Claim [Filed: 12/3/24] ([Docket No. 5065](#))

- B. The International Brotherhood of Teamsters and Teamsters National Freight Industry Negotiating Committee's Amended Response to Debtors' Twenty-Second Omnibus (Substantive) Objection to Proofs of Claim [Filed: 12/5/24] ([Docket No. 5085](#))
- C. Joinder of the Official Committee of Unsecured Creditors to Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims [Filed: 1/20/25] ([Docket No. 5451](#))

Related Documents:

- A. [Proposed] Order Sustaining Debtors' Twenty-Second Omnibus (Substantive) Objection to Proofs of Claim for Cares Act Liability [Filed: 11/21/25] ([Docket No. 5018, Exhibit A](#))
- B. Notice of Submission of Proof of Claim in Connection with Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims Pursuant to Bankruptcy Code Section 502(b) Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 [Filed: 1/7/25] ([Docket No. 5345](#))

Status: The parties have reached a resolution of this matter, subject to documentation. This is matter has been adjourned to a date to be determined.

MATTERS GOING FORWARD

- 6. Debtors' Motion for Entry of an Order (I) Approving (A) the Asset Purchase Agreement with Central Transport, LLC and (B) the Asset Purchase Agreement with Ramar Land Corporation; (II) Authorizing and Approving the Sale of the Acquired Assets Under the Asset Purchase Agreements Free and Clear of Liens, Claims, Interests, and Encumbrances; (III) Approving the Assumption and Assignment of Certain Unexpired Leases Under the Central Transport Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/21/25] ([Docket No. 5463](#))

Response Deadline: January 29, 2025, at 4:00 p.m. (ET).

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- A. [Signed] Order (I) Approving (A) the Asset Purchase Agreement with Central Transport, LLC and (B) the Asset Purchase Agreement with Ramar Land Corporation; (II) Authorizing and Approving the Sale of the Acquired Assets Under the Asset Purchase Agreements Free and Clear of Liens, Claims, Interests, and Encumbrances; (III) Approving the Assumption and Assignment of Certain Unexpired Leases Under the Central Transport Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/21/25] ([Docket No. 5463, Exhibit A](#))
- B. Declaration of Cody Leung Kaldenberg in Support of Entry of Order (I)

Approving (A) the Asset Purchase Agreement with Central Transport, LLC and (B) the Asset Purchase Agreement with Ramar Land Corporation; (II) Authorizing and Approving the Sale of the Acquired Assets Under the Asset Purchase Agreements Free and Clear of Liens, Claims, Interests, and Encumbrances; (III) Approving the Assumption and Assignment of Certain Unexpired Leases Under the Central Transport Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/21/25] ([Docket No. 5466](#))

- C. Motion of Debtors for Entry of an Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving (A) the Asset Purchase Agreement with Central Transport, LLC and (B) the Asset Purchase Agreement with Ramar Land Corporation; (II) Authorizing and Approving the Sale of the Acquired Assets Under the Asset Purchase Agreements Free and Clear of Liens, Claims, Interests, and Encumbrances; (III) Approving the Assumption and Assignment of Certain Unexpired Leases Under the Central Transport Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/21/25] ([Docket No. 5468](#))
- i. [Signed] Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving (A) the Asset Purchase Agreement with Central Transport, LLC and (B) the Asset Purchase Agreement with Ramar Land Corporation; (II) Authorizing and Approving the Sale of the Acquired Assets Under the Asset Purchase Agreements Free and Clear of Liens, Claims, Interests, and Encumbrances; (III) Approving the Assumption and Assignment of Certain Unexpired Leases Under the Central Transport Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/22/25] ([Docket No. 5499](#))
- D. Notice of Hearing on Debtors' Motion for Entry of an Order (I) Approving (A) the Asset Purchase Agreement with Central Transport, LLC and (B) the Asset Purchase Agreement with Ramar Land Corporation; (II) Authorizing and Approving the Sale of the Acquired Assets Under the Asset Purchase Agreements Free and Clear of Liens, Claims, Interests, and Encumbrances; (III) Approving the Assumption and Assignment of Certain Unexpired Leases Under the Central Transport Asset Purchase Agreement; and (IV) Granting Related Relief [Filed: 1/22/25] ([Docket No. 5504](#))

Status: This matter will go forward. If no objections are received by the objection deadline, this matter will proceed via Zoom only with the Court's permission.

INTERIM FEE APPLICATIONS:

7. Interim fee applications are scheduled to go forward at this hearing. Attached hereto as Exhibit A is a complete list of the quarterly fee applications scheduled to be heard. The items listed on Exhibit A hereto correspond to the order of the fee applications, and documents related thereto, that were previously submitted to the Court, pursuant to the Court's Chambers' Procedures.

Responses Received: None.

Related Documents:

- A. Certification of Counsel Regarding Omnibus Order Approving Fifth Interim Fee Applications for Compensation and Reimbursement of Expenses [Filed: 1/28/25] ([Docket No. 5561](#))

Status: The Debtors have filed a proposed order under certification of counsel and respectfully request entry of the order.

Dated: January 28, 2025
Wilmington, Delaware

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Peter J. Keane (DE Bar No. 5503)
Edward A. Corma (DE Bar No. 6718)
**PACHULSKI STANG ZIEHL &
JONES LLP**
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
pkeane@pszjlaw.com
ecorma@pszjlaw.com

Patrick J. Nash Jr., P.C. (admitted pro hac vice)
David Seligman, P.C. (admitted pro hac vice)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: patrick.nash@kirkland.com
david.seligman@kirkland.com

-and-

Allyson B. Smith (admitted pro hac vice)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: allyson.smith@kirkland.com

*Co-Counsel for the Debtors and Debtors in
Possession*